

**UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF TEXAS**

FILED

JUN 06 2018

Clerk, U.S. District Court
Texas Eastern

CRAIG CUNNINGHAM, Plaintiff, v. Greenstar Capital Solutions, LLC, Alex Silverman, Noah Silverman, Trusted Leads, LLC, Schimeon Frederick, Tiffany Frederick, and John/Jane Does 1-5 Defendants	§ § § § § § § § § §
	Case 4:18-cv-00161

**PLAINTIFF'S Motion for a default Judgment and request for a hearing to
determine damages**

1. Pursuant to FRCP rule 55(b)(2), the Plaintiff requests the court enter a default judgment for 48 calls X \$3000 in statutory damages, plus \$3,000 per call in actual damages for invasion of privacy against the defaulting defendants jointly and severally or \$288,000, plus \$500 in costs.
2. The Plaintiff requests the clerk's entry of default against Greenstar Capital Solutions, LLC. The Defendant was served on 4/2/2018, a return of service was filed with the court on 4/18/2018, docket 10, and an answer was originally due on 4/23/2018. The Defendant's corporate officers improperly, but still demonstrating clear awareness of this lawsuit wrote in to the court on 4/24/2018, docket 12., seeking an extension of time in the case on behalf of the corporation pro-se. Although the court struck this argument on 4/30/2018, docket 14, the court graciously granted a 30 day extension to retain counsel and respond to the lawsuit.

3. The Plaintiff has attached an affidavit and spreadsheet of the offending calls, (exhibit A) and screenshots of text messages as (Exhibit B), call records from the Plaintiff's carrier (Exhibit C).
4. The Defendants are in default and have failed to respond to the Plaintiff's complaint.
5. The Plaintiff requests a hearing for damages



Craig Cunningham
Plaintiff,

3000 Custer Road, ste 270-206 Plano, Tx 75075

615-348-1977, 5/31/2018

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Certificate of Service

I certify that a true copy of the foregoing was sent via usps first class mail to the defendants in this case: Greenstar Capital Solutions, LLC c/o Alex Silverman, 40 SE 5th Street, Boca Raton, FL 33432

Craig Cunningham, Plaintiff, Pro-se

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